

Recommendations:

Adopt definitions verbatim

Topics that need to be addressed:

- Need to address Class VI in Class V regulations
- 144.6: Class VI well definition: Prohibit injection into the lowermost USDW except when a waiver is granted
- 144.7: Aquifer exemptions not allowed except for expansion of existing EOR fields
- 144.17 & 144.22: Regulations regarding conversion of Class II to Class VI
- 144.33 Prohibit area permits
- Class VI well definition need to include mention of waiver and AE expansion for Class II
- 146.85 Financial Responsibility
- 146.90(j) Review of testing and monitoring plan
- 146.93(b)(1) Default post-injection site care of 50 years.
- 146.93(c) Demonstration of alternative PISC timeframe.
- 146.95 Waiver process
- Cement to surface for long-string
- Can not exceed 90% of fracture pressure